

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

KHALIL HARBIN,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 4:20-cv-01596-CDP
)	
CITY OF BRECKENRIDGE HILLS, et al.,)	
)	
Defendants.)	

JOINT MOTION TO MODIFY THE CASE MANAGEMENT ORDER

The parties jointly move to modify the Case Management Order in this case. In support of this motion, the parties state:

1. On January 11, 2022, the Court entered an amended Case Management Order. The parties have been engaged in discovery and have chosen a neutral for mediation. However, because of a variety of factors including issues that have arisen during discovery, a pending trial for defense counsel, a COVID diagnosis for plaintiff's counsel, and the press of other business, the parties need to modify the current deadlines.

2. The parties proposed the following new deadlines:

a. Plaintiffs' supplemental expert witnesses and reports shall be disclosed no later than **June 1, 2022**; Plaintiffs' expert witnesses shall be made available for deposition no later than **July 15, 2022**. Defendants' experts and reports shall be disclosed no later than **September 1, 2022**; Defendants' expert witnesses shall be made available for deposition no later than **October 17, 2022**. Rebuttal experts and reports shall be provided no later than **November 15, 2022**, and rebuttal experts shall be made available for

deposition no later than **December 15, 2022**.

- b. If physical examinations of Plaintiff are requested, the requests shall be made by **July 15, 2022**, and the examinations shall be completed by **August 15, 2022**.
- c. All discovery to be completed by **January 16, 2023**.
- d. Any dispositive motions or *Daubert* motions will be filed by **February 15, 2023**.

2. The parties request the following schedule for mediation:

- a. Designation of Neutral/Conference report due by **August 1, 2022**.
- b. Completion of ADR by **September 1, 2022**.
- c. ADR Compliance Report Deadline due by **September 15, 2022**.

3. The earliest possible date by which this case should reasonably be expected to be ready for trial is **June 19, 2023**.

4. The estimated length of time expected to try the case to verdict is 4-5 days.

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